

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

PARKER-HANNIFIN CORPORATION,	:	
	:	
Plaintiff,	:	
	:	
v.	:	C.A. No. 06-751-MPT
	:	
ZIPPERTUBING (JAPAN), LTD.,	:	
	:	
Defendant.	:	
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PARKER-HANNIFIN CORPORATION,	:	
	:	
Plaintiff,	:	
	:	
v.	:	C.A. No. 07-104-MPT
	:	
SEIREN CO., LTD.,	:	
	:	
Defendant.	:	
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**DECLARATION OF WILLIAM I. FLANDERS IN SUPPORT OF  
PLAINTIFFS' ANSWERING CLAIM CONSTRUCTION BRIEF**

I, William I. Flanders, hereby declare and state as follows:

1. I am the Division Marketing Manager - Americas for the Chomerics Division of Parker-Hannifin Corporation. I received a B.S. in Interdisciplinary Engineering from Clarkson University in 1976. I have eighteen (18) years of experience in the electromagnetic interference ("EMI") shielding industry. I have nine (9) years of experience with design and manufacture of foam-based EMI shielding gaskets.
2. I have previously submitted a declaration in this matter dated July 1, 2008 in connection with Parker's opening claim construction briefs.
3. As stated in my prior declaration, I am a coinventor of the subject matter described and claimed in U.S. Patent Nos. 6,248,393; 6,387,523; 6,521,348; 7,165,36 and

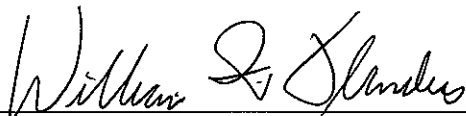
6,777,095. I understand these patents are at issue in this matter and refer to them herein as the "patents-in-suit."

4. Before the inventions of the patents-in-suit, the state of the art for EMI shielding gasket manufacture was to heavily load the foam core with a flame retardant material such as graphite in order to achieve V-0 ratings.

5. One disadvantage of EMI gaskets manufactured in this manner, however, is that the flame retardant additives make the foam core less resilient over time. This diminishes the gasket's ability to seal the gap in structures such as doors that need to be repeatedly opened and closed.

6. The patents-in-suit solve this problem by loading the majority of the flame retardant additives in a coating that coats at least a portion of the interior surface of the fabric that is wrapped around the foam core as a jacket, instead of loading the foam core, itself (which would not be given a V-0 rating if separately tested), in order to achieve a resilient gasket that would be effective to afford the gasket a V-0 rating.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. This Declaration is executed this 15th day of July, 2008.

  
\_\_\_\_\_  
William I. Flanders

**CERTIFICATE OF SERVICE**

I hereby certify that on July 15, 2008, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to counsel of record on the Court's CM/ECF registrants for this case. I further certify that on July 15, 2008, I caused a copy of the foregoing document to be served upon the following in the manner indicated:

**BY E-MAIL AND HAND DELIVERY**

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/s/ Francis DiGiovanni

Francis DiGiovanni (#3189)